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February 22, 2021

**VIA ECF**

Honorable Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: Travelscape d/b/a/ Expedia Group Media Solutions v. Crossmedia, No. 21-cv-4**

Dear Judge Liman:

We respectfully submit this letter on behalf of Plaintiff Travelscape d/b/a/ Expedia Group Media Solutions ("Expedia"). As your honor is aware, an initial pre-trial conference is scheduled for March 3, 2021, and in connection with that conference, this Court ordered the parties to file a proposed Case Management Plan and Scheduling Order by February 24. In light of recent events, Expedia respectfully requests a 30-day continuance of the pre-trial conference as well as all associated deadlines.

On January 4, 2021, Expedia filed its Complaint, alleging Crossmedia owed Expedia \$1,674,660 pursuant to unpaid invoices. (ECF No. 6.) On February 4, 2021, Crossmedia filed its Answer. (ECF No. 12.) On February 17, 2021, and on its own accord, Crossmedia paid Expedia \$1,483,050.45, constituting the total outstanding principal balance owed to Expedia.<sup>1</sup> The parties are currently engaged in discussions to fully resolve this matter. Accordingly, in view of judicial economy, Expedia respectfully requests a 30-day continuance of the pre-trial conference as well as all other deadlines, after which time the parties will update the Court on the status of the settlement discussions. We have conferred with Crossmedia's counsel and they consent to this request.

We thank the Court for its time and consideration.

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<sup>1</sup> Since filing its Complaint, Expedia has confirmed that Crossmedia had paid certain invoices, leaving due a principal amount of \$1,483,050.45 that was at issue in this matter.

Respectfully submitted,

Levine Lee LLP


s/ Christos G. Papapetrou

Christos G. Papapetrou

cc: All parties (via ECF)

GRANTED. The initial pretrial conference previously scheduled for March 3, 2021 is ADJOURNED until April 13, 2021 at 10:00 a.m. The parties shall jointly submitted a proposed Case Management Plan and Scheduling Order one week prior to the conference. The case is STAYED in the meantime.

SO ORDERED. 2/23/2021.

  
LEWIS J. LIMAN  
United States District Judge